

To whom it may concern;

I am writing to voice my concern regarding the possible implementation of Broadband over Power Line (BPL) systems.
Please see my comments to specific points in ET Docket 03-104, below.

Regarding "The potential interference effects, if any, on authorized spectrum users":

My primary concern with regards to interference is interference to licensed services, and more specifically to the Amateur Radio Service which has significant frequency allocations in the 2 - 80MHz region.

Attempts to implement similar BPL systems in Japan and Europe clearly indicate that significant interference to the Amateur Radio Service is likely to occur. In fact, Japan's government concluded that it is not suitable to allow the use of HF frequencies for PLC (Power Line Communications) systems.

Given current Part 15 rules and regulations, the power line companies would be responsible for mitigating any interference to licensed services that occurs as a result of BPL. However, based upon the large number of letters that FCC Special Counsel Riley Hollingsworth has written to power line companies, it is clear that most power line companies do not currently understand their responsibilities under FCC Part 15. It is clear that many power line companies feel that they are not responsible for interference to licensed services or feel that they have the right to bill interference complainants for the work that is necessary to mitigate such interference. I do not feel that power line companies are prepared to take on the responsibility of a RF-based system such as BPL.

Regarding "Changes that may be needed in Part 15 technical rules and the equipment approval process to foster the development of BPL and to ensure that interference is not caused to other services as a result of this technology":

I feel very strongly that FCC Part 15 should not be "softened" in any way in order to support the implementation of BPL. Licensed services should continue to be protected from interference from Part 15 devices (including BPL) at all costs! Although I do not support the implementation of BPL using HF, Part 15 must continue to make it clear to power line companies that they have a responsibility to mitigate interference with licensed services such as the Amateur Radio Service if BPL is implemented.

Thank you for considering my comments.

Sincerely,

Michael J. Linden (Amateur Radio Service callsign N9BDF)

member, IEEE (Institute of Electrical and Electronics
Engineers)

ARRL (American Radio Relay League)